



Montana Department of
ENVIRONMENTAL QUALITY

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Judy Martz, Governor

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January 16, 2003

Kootenai Development Company
317 Mineral Avenue
Libby MT 59923-1953

Re: Operating Permit # 00010
Field Inspection Report

Enclosed is Kootenai Development Company's copy of the field inspection conducted by the Department's Hard Rock Program on July 18, 2002.

Please do not hesitate to contact the inspector(s) conducting this inspection if you have any questions.

Sincerely,

Jade Nicolay
Administrative Assistant
Environmental Management Bureau

Enclosure
JN/jn

cc: Craig French, DEQ
Jim Christiansen, EPA

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
HARD ROCK PROGRAM
OPERATING PERMIT - FIELD INSPECTION REPORT**

FOR TITLE 82, CHAPTER 4, PART 3 et seq. MCA

Operator: Kootenai Development Company

Date: July 18, 2002

Operating Permit No.: 00010 Project: Libby Vermiculite Mine County: Lincoln

Legal Description & Nearest City or Town: section 15 and 22, T31N, R29W 8 miles northeast of Libby

Inspector(s): Patrick Plantenberg, Craig French, DEQ; Jim Christiansen, EPA; Jeff Montair, CDM;
and two MARCOR representatives;

Company Representative(s): none

Mineral(s): vermiculite, rip rap Agencies w/Overlapping Jurisdiction: ☐ USFS ☐ BLM ☒ Others EPA, DNRC ☒ None

Purpose of Inspection

Type of Operation

- | | |
|---|--|
| <input type="checkbox"/> Initial (Pre-permitting) | <input checked="" type="checkbox"/> Open Pit |
| <input checked="" type="checkbox"/> Regular Compliance | <input type="checkbox"/> Underground |
| <input type="checkbox"/> Amendment # _____ MR # _____ | <input type="checkbox"/> Placer |
| <input type="checkbox"/> Complaint Received | <input type="checkbox"/> Heap Leach |
| <input type="checkbox"/> Bond Release Request | <input type="checkbox"/> Vat Leach |
| <input checked="" type="checkbox"/> Other (TOUR, etc) <u>Show EPA reclamation on site</u> | <input type="checkbox"/> Flotation Mill |
| | <input type="checkbox"/> Mill |

Inspection Checklist

Yes No N/A

INITIAL INSPECTION

- | | | |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Adjacent residents |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Adjacent designated Special Land Uses (Wilderness, ACEC, etc) |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Adjacent surface water |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Site Access Concerns |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Pre-existing historic disturbances |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Site conditions/resources of concern |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Need for additional pre-permitting inspections |

GENERAL

- | | | |
|-------------------------------------|--------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> All mining-related disturbances within permitted & bonded areas |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> Incremental bonding requirements have been submitted |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Following approved mining plan and permit conditions |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> Following approved monitoring plans |
| <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> Reclamation concurrent with mining |

OPERATING PERMIT - FIELD INSPECTION REPORT - continued

Operator: Kootenai Development Company Date: July 18, 2002

Operating Permit No.: 00010 Project: Libby vermiculite mine County: Lincoln

Yes No N/A

MATERIALS HANDLING

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Soil salvage according to plan
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Soil stockpiles properly maintained
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Special handling/stockpiling of materials consistent with plan
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Evidence of uncontained acid rock drainage

WATER CONTROLS

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Erosion-control measures concurrent with mining, BMPs in place
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Erosion/sedimentation problems
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Culverts installed and maintained as approved
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Water discharge(s) occurring
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Diversions maintained and functioning as approved
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Process/storage/settling pond(s) constructed, operating, and maintained as approved
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Adequate freeboard in all solution storage & process facilities

AIR QUALITY

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Air quality control measures operational (including roads)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Air quality problems evident

FACILITIES

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Construction reports properly filed
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Liner integrity problems observed
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Tailing impoundment/heap leach/dump design as approved
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Road construction as approved
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Contingency plans operational
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Public health & safety problems

OTHER

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Noxious weeds present
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Wildlife mitigations in place and functioning
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Wildlife problems observed
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Cultural resource mitigations properly implemented
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Water sample(s) taken
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Materials sample(s) taken
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Photos taken
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> Compliance problems observed
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Other:

OPERATING PERMIT - FIELD INSPECTION REPORT - continued

Operator: Kootenai Development Company Date: July 18, 2002

Operating Permit No.: 00010 Project: Libby vermiculite mine County: Lincoln

DISCUSSION (Include the status of ongoing activities and compliance. If the site visit was a tour, include purpose of tour, participants and related post-tour activities that would result.): ^

We met in Libby and traveled to the mine site to tour the reclamation. We suited up and first toured the tailings impoundment area. The wetland on the tailings area continues to flourish. We discussed the need to sample fish in the pond for effects of the asbestiform materials. Also, we discussed the need to sample the overflow from the pond during high runoff for exceedances of asbestiform fibers.

The coarse tailings trees continue to grow and are now visible from the Rainy Creek road. The 45-acre area in the permit still needs some erosion control/resloping work to stabilize the oversteepened slopes. The coarse tailings area trees look good. The infertile materials in the coarse tailings have limited the grass establishment until some organic/nutrient cycling begins. A good shot of fertilizer would help on all areas.

We toured the rest of the mine area. The reclamation on the site is slowly filling in. Again, fertilization would help. Air monitoring is needed to identify if asbestiform fibers are leaving the site.

EPA will be deciding what to do at the mine site in the coming years.

Deadline for Follow-up Action: none

Compliance Action Taken/NON No.: none

Abatement Inspection Needed on: none

Exit Interview Conducted With: none

Authorized Signature: Paul Z. [Signature] Date: 12/31/02

Copy inspection Reports To: Alan Stringer, WR Grace; Craig French, DEQ; Jim Christiansen, EPA

File 00010.20 and .21

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VIEWS OF COARSE TAILINGS AREA COVERED BY PERMIT



VIEWS OF TAILINGS IMPOUNDMENT FROM ACCESS ROAD
UP TO MINE